In the matter of: ET DOCKET NO. 02-98 RM-9404

LOW FREQUENCY ALOCATION FOR AMATEUR SERVICE

As an avid LF experimenter I would urge the Commission to consider the following change to RM-9404:

Power Output to be limited to 1W ERP rather than the proposed 1W EIRP. This request is based upon the belief (and large body of evidence) that this power level will not be of sufficient level to cause disturbance to PLC operation in this region of the spectrum. European models have shown that this power level can co-exist with no documented cases of amateur-based PLC interference and, in fact, European PLC operations are unaffected even by the operations of European International Broadcast stations (several hundred KWs) operating on adjacent frequencies. In addition, many PLC systems (and probably most eventually) employ the Forward Error Correcting (FEC) digital mode, making the PLC system almost bullet-proof for unwanted interference. The European model has responsibly demonstrated that amateur's need not be penalized at punative power levels for a problem that does not exist. In reality, even the 1W ERP level is extremely difficult to attain owing to the hugely inefficient amateur antenna systems at this frequency. Amateur communication on this frequency will be challenge enough at the 1W ERP level -- please don't make it almost impossible by restricting levels at 1W EIRP.

Respectfully,

J. Steve McDonald VE7SL

(Present holder of longest North American LOWFER reception record -"NC" North Carolina to B.C., Canada and 1st North American reception of New Zealand LOWFER signals ZL6QH)